UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

CENTER FOR BIOLOGICAL)
DIVERSITY, TROPICAL AUDUBON)
SOCIETY, and the MIAMI BLUE)
CHAPTER of the NORTH AMERICAN)
BUTTERFLY ASSOCIATION,)
)
Plaintiffs,)
)
v.) Case No.: 2:22-cv-14244-AMC
)
DEBRA HAALAND, U.S.)
DEPARTMENT OF THE INTERIOR,)
MARTHA WILLIAMS, and the U.S)
FISH AND WILDLIFE SERVICE,)
)
Defendants.	

DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE ANSWER OR OTHER RESPONSE TO PLAINTIFFS' COMPLAINT

Defendants (Debra Haaland, in her official capacity, U.S. Department of the Interior, Martha Williams, in her official capacity, and the U.S. Fish and Wildlife Service), by and though undersigned counsel, respectfully request an enlargement of time, to and including November 3, 2022, to file an answer or other response to Plaintiffs' Complaint in this action pursuant to Fed. R. Civ. P. 12. In support of this motion, Defendants states as follows:

- 1. Defendants' answer or other response to Plaintiffs' Complaint is currently due on September 19, 2022, pursuant to Fed. R. Civ. P. 12(a)(2).
- 2. The requested enlargement of time is necessary for Defendants to evaluate the possibility of a settlement that may obviate the need for further proceedings before this Court.

3. Pursuant to LCvR 7(m), undersigned counsel has conferred with counsel for the Plaintiffs and has been authorized to represent that the relief requested in this motion is unopposed.

Based on the foregoing, Defendants respectfully request an enlargement of time to and including November 3, 2022, in which to answer or otherwise respond to Plaintiffs' Complaint.

Dated September 8, 2022

Respectfully submitted,

TODD KIM, Assistant Attorney General Environment & Natural Resources Division S. JAY GOVINDAN, Acting Chief MEREDITH L. FLAX, Assistant Chief

/s/ Mark Arthur Brown

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 8, 2022, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

By: s/ Mark Arthur Brown
Mark Arthur Brown